



October 30, 2019

**U.S. MAIL, RETURN RECEIPT REQUESTED**

7018 2290 0000 9542 7310

U.S. EPA Region III  
Director, Air Protection Division  
Mail Code 3WC22  
1650 Arch Street  
Philadelphia, PA 19103-2029

**U.S. MAIL, RETURN RECEIPT REQUESTED**

7018 2290 0000 9542 7327

Division of Air Quality  
WVDEP  
601 57<sup>th</sup> Street  
Charleston, WV 25304-2345

**RECEIVED**

NOV 08

**Air & Radiation Division**

**Re: Dominion Energy Transmission, Inc. – Burch Ridge Compressor Station  
NSPS OOOOa - Annual Report**

Dear Sirs and/or Madam:

Dominion Energy Transmission, Inc. (DETI) owns and operates the Burch Ridge Compressor Station, located in Proctor, West Virginia and is subject to 40 CFR 60, Subpart OOOOa, Standards of Performance for Crude Oil, and Natural Gas Facilities.

In accordance with 40 CFR 60.5420a(b), DETI is submitting the annual report for the Burch Ridge Compressor Station covering the time period of August 2, 2018 thru August 1, 2019. The affected facility at the Burch Ridge Compressor Station subject to 40 CFR 60, Subpart OOOOa is the collection of fugitive emission components at the compressor station.

This annual report is being submitted according to the requirements specified in §60.5420a (b) and includes the following:

1. Attachment A: Certification by Certifying Official
2. Attachment B: General Site Information
3. Attachment C: Annual Fugitive Emissions Monitoring Report

Burch Ridge – NSPS OOOOa - Annual Report  
October 30, 2019  
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If you have any questions regarding this submittal, please contact Sean Warden at (804) 273-3263, or via email at [Richard.S.Warden@dominionenergy.com](mailto:Richard.S.Warden@dominionenergy.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Effinger', with a long horizontal flourish extending to the right.

Thomas N. Effinger  
Director, Environmental Services

Enclosures

## **Attachment A**

### **Certification by Certifying Official**

**WEST VIRGINIA CERTIFICATE OF DATA ACCURACY**

**Annual Report - 0000a  
October 30, 2019  
Burch Ridge Compressor Station**

**Company Name: Dominion Energy Transmission, Inc.  
Facility Name: Burch Ridge Compressor Station  
Facility Address: 6411 Burch Ridge Road  
Proctor, WV 26055**

**Permit Number: R13-2834B**

**Federal Tax ID – Plant Code: 55-0629203**

**Certification:** I, John M. Lamb, certify that I am a company officer or plant manager or authorized representative of the facility identified above, authorized to make this affidavit. I further certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete.

Signature: \_\_\_\_\_



John M. Lamb  
Vice President, Eastern Pipeline Operations

Date: \_\_\_\_\_

10/29/19

*(Use Blue Ink)*

**Attachment B**  
**General Site Information**

**Dominion Energy Transmission, Inc.**  
**Burch Ridge Compressor Station**  
**2019 Annual Report**  
**General Site Information**

<b>SITE INFORMATION</b>	Company Name (§60.5420a(b)(1)(i))	Dominion Energy Transmission, Inc.
	Facility Site Name (§60.5420a(b)(1)(i))	Burch Ridge Compressor Station
	Address of Affected Facility (§60.5420a(b)(1)(i))	6411 Burch Ridge Road
	City	Proctor
	County	Wetzel
	State Abbreviation	WV
	Zip Code	26055
<b>Identification of Affected Facility(s)</b>	Identification of each affected facility being included in the annual report. (§60.5420a(b)(1)(ii))	1. Collection of fugitive emission components at the compressor station
<b>REPORTING INFORMATION</b>	Beginning Date of Reporting Period. (§60.5420a(b)(1)(iii))	08/02/18
	Ending Date of Reporting Period. (§60.5420a(b)(1)(iii))	08/01/19
<b>Certification Official</b>	Name and title of certifying official (§60.5420a(b)(1)(iv))	John Lamb / VP Eastern Pipeline Operations (Certification in Attachment A)

**Attachment C**

**Annual Fugitive Emissions Monitoring  
Report**



## LDAR Report

**Dominion**

**Burch Ridge - LDAR**

**Annual Report**

**NSPS Subpart OOOOa**

**PERIOD: 8/2018 - 8/2019**

Prepared By:

**Target Emission Services**

800 Town and Country Blvd. (Suite 300)  
Houston, Texas, 77024

[WWW.TARGETEMISSION.COM](http://WWW.TARGETEMISSION.COM)

Report Generated on: Sep 16, 2019



# SUMMARY



<b>Company:</b>	Dominion		<b>Report:</b>	Annual LDAR		
<b>District:</b>	DETI-Southern		<b>Regulation(s):</b>	NSPS Subpart 0000a		
<b>Facility Name:</b>	Burch Ridge - LDAR		<b>Report Date:</b>	Sep 16, 2019		
<b>GPS Coord.</b>	39.750877	-80.798114	<b>Period:</b>	2018-Aug-02	TO	2019-Aug-01

This report satisfies the requirements of 40 CFR §60.5420a(b)(7) for the collection of fugitive emissions components at the above referenced compressor station.

Information required to be reported per §60.5420a(b)(7)(i) - (vi)					
Monitoring Quarter	Q4	Q1	Q2	Q3	
<b>Survey Start Date/Time</b>	10/04/2018 4:15 PM	02/07/2019 1:55 PM	04/23/2019 10:00 AM	survey conducted after report date	
<b>Survey End Date/Time</b>	10/04/2018 7:00 PM	02/07/2019 4:55 PM	04/23/2019 2:30 PM		
<b>OGI Technician</b> <small>(see Appendix for OGI Technician Training and Experience)</small>	Andrew Sheffler	Justin Vecchio	Evan Musselman		
<b>Ambient Temp. (°F)</b>	71	58	56		
<b>Sky Conditions</b>	Overcast, >90% of the sky is covered by clouds	Mostly Cloudy, 50%-90% sky is clouds	Partly Cloudy, 10%-50% sky is clouds		
<b>Max. Wind Speed (MPH)</b>	5	8	7		
<b>LDAR Instrument</b>	Optical Gas Imaging/GFX- 320	Optical Gas Imaging/GFX- 320	Optical Gas Imaging/GFX- 320		
<b>§60.5420a(b)(7)(vi) Deviations from Monitoring Plan</b>	Yes	No deviations from the Monitoring Plan	No deviations from the Monitoring Plan		
<b>Deviation(s) Explanation</b>	Completed outdoor scan of piping prior to Turbine building due to rain	N/A	N/A		

§60.5420a(b)(7)(vii) - Number and type of components for which fugitive emissions were detected					
Valves	1		2		
Connectors	8	2	3		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					
<b>Total No. of Leaks Detected</b>	9	2	5		

§60.5420a(b)(7)(viii) - Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h)					
Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(c)(15)(ii)(I)(7) - Number and type of components that were tagged as a result of not being repaired during the monitoring survey as required in §60.5397a(h)(3)(ii).					
Valves	1		2		
Connectors	6	1	2		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(b)(7)(ix) - Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored					
Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(b)(7)(x) - Date of successful repair of the fugitive emission component (see Repair List).

§60.5420a(b)(7)(xi) - Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair (see DOR List).

§60.5420a(b)(7)(xii) - Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding (see Repair List).

### Fugitive Emissions Components Placed on DOR

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(xi), "number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair".

Component					
Quarter	Q4	Q1	Q2	N/A	N/A
Survey Date	10/04/18	02/07/19	04/23/19		
Valves	1				
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					
Total No. of Leaks on DOR	1				
Date Surveyed	Emission ID #	Component Type	Current Repair Status	Delay of Repair Explanation / Justification	
2018-10-04	25510248	Valve	Repaired	Shutdown required	



**Fugitive Emissions Components Repaired During Reporting Period**

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(x), "date of successful repair of the fugitive emission component" and §60.5420a(b)(7)(xii), "type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding".

Date Surveyed	Emission ID #	Date of Successful Repair	Repair Confirmation Method / Instrument
2018-10-04	25510244	2018-Oct-04	OGI
2018-10-04	25510246	2018-Oct-04	OGI
2018-10-04	25510247	2018-Oct-15	Snoop
2018-10-04	25510250	2018-Oct-19	Snoop
2018-10-04	25510245	2018-Oct-22	Snoop
2018-10-04	25510249	2018-Oct-23	Snoop
2018-10-04	25510242	2018-Oct-29	Snoop
2018-10-04	25510243	2018-Oct-29	Snoop
2019-02-07	26310012	2019-Feb-07	OGI
2019-02-07	26310013	2019-Feb-14	Snoop
2019-04-23	26410073	2019-Apr-23	OGI
2019-04-23	26410075	2019-May-17	Snoop
2019-04-23	26410076	2019-May-17	Snoop
2019-04-23	26410072	2019-May-20	Snoop
2019-04-23	26410074	2019-May-20	Snoop
2018-10-04	25510248	2019-Jun-26	Snoop

### OGI Technician Training and Experience

Monitoring surveys are performed by personnel that are trained in the proper operation of the OGIC (Optical Gas Imaging Camera) to be used in the monitoring survey and that have prior experience using OGICs for the purposes of identifying fugitive emissions. Additionally, monitoring personnel are familiar with the types of equipment located at a natural gas compressor station. All monitoring personnel review each site specific monitoring plan prior to performing monitoring surveys at the Facility.

All Monitoring Technicians follow a protocol containing technical procedures, training requirements, and individual and team performance audits. This protocol ensures that each crew member follows a prescriptive training program. The training program includes minimum required field times for each module. Each module uses both written testing and on-site work performance audits to evaluate the crew member on their work performance.

Each crew member must successfully complete their training modules to be allowed to work as a member of the main field crew. The protocol also includes an audit program to evaluate work performance on an on-going basis. This system ensures that each crew member is adhering to the procedures and guidelines of the protocol.

Each monitoring technician:

- 1) holds a strong knowledge of oil and gas operations and has a detailed understanding of the various processes that are involved in the transportation and processing on natural gas.
- 2) is trained (certified) and experienced in the use of fugitive emission detection and measurement equipment;
- 3) has a minimum of 1000 hours of experience on the use of optical gas imaging, ultrasonic leak detection and emission flow rate measurement
- 4) maintains required safety training and strong understanding of applicable TARGET Safe Operating Procedures; and
- 5) received performance audits to ensure compliance to our prescriptive fugitive emission assessment protocol

The protocol contains technical procedures, training requirements, and individual and team performance audits. The purpose of our assessment protocol is to:

- 1) Maintain a high degree of Quality Control;
- 2) Ensure that all sources of fugitive emissions are identified;
- 3) Ensure that all source data is consistently recorded to provide reliable and effective emission reduction recommendations.

This protocol eliminates the common problems and barriers that cause many programs to fail. Our staff are trained and audited to avoid many of the common fugitive emission program problems. Some of these common problems include:

- Inexperienced with camera use and the concepts of infrared thermography
- Not using multiple camera angles
- Constantly moving the camera from scene to scene without pausing in each view to look for gas images
- Many leaks are missed by relying solely on the automatic mode (manual mode can be more effective in certain situations)
- Scanning too fast and missing components

Accurate data collection and entry is crucial to maintaining an effective Fugitive Emission Management Program. The data management protocol includes a data QA/QC review process that contains three levels of evaluation:

- 1) Technician Self Check – at the end of each assessment the technician must review each emission entry to locate and remediate any data inconsistencies
- 2) Team Lead Review – at the end of each work day the Team Lead will run a QA/QC evaluation on each assessment and emission to ensure that data has been entered following the TARGET Protocol.
- 3) Project Manager Evaluation – on a weekly basis the project manager will run all emission data through a QA/QC data evaluation to detect and eliminate any inconsistencies.

**OGI Technician Training and Experience**

Survey Date	OGI Technician	Certification Date	Months of OGI Experience
2018-Oct-04	Andrew Sheffler	2017-Sep-05	14
2019-Feb-07	Justin Vecchio	2018-Oct-01	5
2019-Apr-23	Evan Musselman	2018-Jul-15	10